

UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re: X Chapter 11
CarePoint Health Systems Inc. d/b/a Just Health : Case No. 24-12534 (JKS)
Foundation, et al.,¹ : (Jointly Administered)
Debtors. : v

**NOTICE OF AGENDA REGARDING MATTERS SCHEDULED FOR HEARING ON
JANUARY 13, 2025 AT 10:00 A.M. (ET)²**

THIS HEARING HAS BEEN CANCELLED.

I. MATTERS BEING CONTINUED

1. Motion of Debtors IJKG Opco, LLC and IKJG, LLC for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow *Inter Alia*, Interim Hospital Operations, (B) A Final Order Approving A Private Sale of All Or Substantially All Assets of IJKG Opco, LLC and IKJG, LLC and (C) Granting Related Relief [Filed: 11/04/2024, D.I. [18](#)].

Related Documents:

¹ The Debtors in these Chapter 11 Cases, along with the last four digits of each Debtor's federal tax identification number are: (i) Bayonne Intermediate Holdco, LLC (7716); (ii) Benego CarePoint, LLC (2199); (iii) Briar Hill CarePoint, LLC (iv) CarePoint Health Management Associates Intermediate Holdco, LLC (none); (v) CarePoint Health Management Associates, LLC d/b/a CarePoint Health (3478); (vi) CarePoint Health Systems, Inc. d/b/a Just Health Foundation (6996); (vii) CH Hudson Holdco, LLC (3376); (viii) Christ Intermediate Holdco, LLC (3376); (ix) Evergreen Community Assets (1726); (x) Garden State Healthcare Associates, LLC (4414); (xi) Hoboken Intermediate Holdco, LLC (2105); (xii) Hudson Hospital Holdco, LLC (3869); (xiii) Hudson Hospital Opco, LLC d/b/a CarePoint Health-Christ Hospital (0608); (xiv) HUMC Holdco, LLC (3488); (xv) HUMCO Opco, LLC d/b/a CarePoint Health-Hoboken University Medical Center (7328); (xvi) IJKG, LLC (7430); (xvii) Just Health MSO, LLC (1593); (xviii) New Jersey Medical and Health Associates d/b/a CarePoint Health Medical Group (0232); (xix) Quality Care Associates, LLC (4710); (xx) Sequoia BMC Holdco, LLC (9812); (xxi) IJKG Opco LLC d/b/a CarePoint Health-Bayonne Medical Center (2063). The address for CarePoint Health Systems Inc. is 308 Willow Avenue, Hoboken, NJ 07030.

² All motions and other pleadings referenced herein are available online at the following web address:
<https://dm.epiq11.com/CarePoint>

- A. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)].
- B. Certification of Counsel Regarding Order Approving Stipulation Modifying Prior Stipulation and Rescheduling Certain Matters for hearing on January 7, 2025 [Filed: 12/09/2024; D.I. [266](#)]
- C. Order Approving Stipulation Modifying Prior Stipulation and Rescheduling Certain Matters for hearing on January 7, 2025 [Filed: 12/10/2024; D.I. [272](#)]

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The supplemental objection deadline is December 11, 2024 at 4:00 p.m. (ET). The Objection Deadline was further extended to December 20, 2024 at 4:00 p.m. (ET)[D.I. [272](#)].

Responses:

- D. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024, D.I. [71](#)].
- E. BMC Hospital, LLC's Objection to (I) Bayonne Debtors' DIP Financing Motion (II) Collateral Surrender Motion, and (III) Management Services Motion [Filed: 11/06/2024; D.I. [76](#)].
- F. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)].
- G. Limited Objection of Sodexo Operations, LLC to: (1) Motion of Debtors IJKG Opco, LLC and IJKG, LLC for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow Inter Alia, Interim Hospital Operations, (B) A final Order Approving a Private Sale of All or Substantially All Assets of IJKG opco, LLC and IJKG, LLC and (C) Granting Related Relief; (2) Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Assumption of Management Services Agreement, (II) Scheduling a Final Hearing, and (III) Granting Related Relief; and (3) Motion of the Debtors for an Order (I) Authorizing the Entry Into the Hospital Facilities Management Services Agreement, and (II) Granting Related Relief [Filed: 12/19/2024; D.I. [331](#)].
- H. Reservation of Rights and, to the Extent Necessary, Limited Objection to Debtor's Motion for Entry of Orders (A) Approving Collateral Surrender Agreement and (B) Authorizing the Assumption of the Management Services Agreement and the Form and Manner of Notice Thereof [Filed: 12/20/2024; D.I. [332](#)].
- I. Reservation of Committee of Interns and Residents to Debtors' Motion for a Private Sale of Bayonne Medical Center [Filed: 12/20/2024; D.I. [333](#)].

- J. First Financial Holdings, LLC dba First Financial Equipment Leasing's Opposition to Debtors IJKG Opco, LLC and IKJG, LLC's Motion for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow Inter Alia, Interim Hospital Operations, (B) A final Order Approving a Private Sale of All or Substantially All Assets of IJKG opco, LLC and IJKG, LLC and (C) Granting Related Relief [Filed: 12/20/2024; D.I. [334](#)].
- K. Affidavit in Support of Opposition of First Financial Holdings, LLC dba First Financial Equipment Leasing re D.I. 334 [Filed: 12/20/2024; D.I. [335](#)].
- L. Joinder of SCG Capital Corporation to First Financial Holdings, LLC dba First Financial Equipment Leasing's Opposition to Debtors IJKG Opco, LLC and IKJG, LLC's Motion for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow Inter Alia, Interim Hospital Operations, (B) A final Order Approving a Private Sale of All or Substantially All Assets of IJKG opco, LLC and IJKG, LLC and (C) Granting Related Relief [Filed: 12/20/2024; D.I. [337](#)].
- M. Limited Objection and Reservation of Rights of Cerecore [Filed: 12/20/2024; D.I. [338](#)].

Status: The Debtors are not seeking approval of the Motion at this time. The Debtors will seek limited relief related to the Motion pursuant to D.I. 377 at a hearing scheduled for January 17, 2025 at 10:00 a.m.

- 2. Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Assumption of Management Services Agreement, (II) Scheduling a Final Hearing, and (III) Granting Related Relief [Filed: 11/04/2024, D.I. [19](#)].

Related Documents:

- A. Order Approving Stipulation Regarding Matters Scheduled for Hearing on December 16, 2024 [Filed: 12/02/2024; D.I. [214](#)].
- B. Certification of Counsel Regarding Order Approving Stipulation Modifying Prior Stipulation and Rescheduling Certain Matters for hearing on January 7, 2025 [Filed: 12/09/2024; D.I. [266](#)]
- C. Order Approving Stipulation Modifying Prior Stipulation and Rescheduling Certain Matters for hearing on January 7, 2025 [Filed: 12/10/2024; D.I. [272](#)]

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The supplemental objection deadline is December 11, 2024 at 4:00 p.m. (ET). The Objection Deadline was further extended to December 20, 2024 at 4:00 p.m. (ET)[D.I. [272](#)].

Responses:

- D. Limited Objection of Insight Management and Consulting Services, Inc. to Debtors' First Day Motions [Filed: 11/06/2024, D.I. [71](#)].
- E. BMC Hospital, LLC's Objection to (I) Bayonne Debtors' DIP Financing Motion (II) Collateral Surrender Motion, and (III) Management Services Motion [Filed: 11/06/2024; D.I. [76](#)].
- F. Supplemental Objection of Insight Management and Consulting Services Inc. to Debtors' First Day Motions [Filed: 11/07/2024; D.I. [109](#)].
- G. Limited Objection of Sodexo Operations, LLC to: (1) Motion of Debtors IJKG Opco, LLC and IKJG, LLC for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow Inter Alia, Interim Hospital Operations, (B) A final Order Approving a Private Sale of All or Substantially All Assets of IJKG opco, LLC and IJKG, LLC and (C) Granting Related Relief; (2) Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Assumption of Management Services Agreement, (II) Scheduling a Final Hearing, and (III) Granting Related Relief; and (3) Motion of the Debtors for an Order (I) Authorizing the Entry Into the Hospital Facilities Management Services Agreement, and (II) Granting Related Relief [Filed: 12/19/2024; D.I. [331](#)].
- H. Limited Objection and Reservation of Rights of Cerecore [Filed: 12/20/2024; D.I. [338](#)].

Status: The Debtors are not seeking approval of the Motion at this time. The Debtors will seek limited relief related to the Motion pursuant to D.I. 377 at a hearing scheduled for January 17, 2025 at 10:00 a.m.

- 3. Motion of the Debtors for an Order (I) Authorizing the Entry Into the Hospital Facilities Management Services Agreement, and (II) Granting Related Relief [Filed: 12/01/2024; D.I. [212](#)].

Related Documents:

- A. Certification of Counsel Regarding Order Approving Stipulation Modifying Prior Stipulation and Rescheduling Certain Matters for hearing on January 7, 2025 [Filed: 12/09/2024; D.I. [266](#)]

B. Order Approving Stipulation Modifying Prior Stipulation and Rescheduling Certain Matters for hearing on January 7, 2025 [Filed: 12/10/2024; D.I. [272](#)]

Objection Deadline: December 9, 2024 at 4:00 p.m. (ET). The Objection Deadline was extended to December 20, 2024 at 4:00 p.m. (ET).

Objections Received:

C. Limited Objection of Sodexo Operations, LLC to: (1) Motion of Debtors IJKG Opco, LLC and IKJG, LLC for Entry of (A) an Interim Order Approving Collateral Surrender and Operations Transfer Agreement to Allow Inter Alia, Interim Hospital Operations, (B) A final Order Approving a Private Sale of All or Substantially All Assets of IJKG opco, LLC and IJKG, LLC and (C) Granting Related Relief; (2) Motion of the Debtors for Entry of Interim and Final Orders (I) Authorizing the Assumption of Management Services Agreement, (II) Scheduling a Final Hearing, and (III) Granting Related Relief; and (3) Motion of the Debtors for an Order (I) Authorizing the Entry Into the Hospital Facilities Management Services Agreement, and (II) Granting Related Relief [Filed: 12/19/2024; D.I. [331](#)].

D. Limited Objection and Reservation of Rights of Cerecore [Filed: 12/20/2024; D.I. [338](#)].

Status: The Debtors are not seeking approval of the Motion at this time. The Debtors will seek limited relief related to the Motion pursuant to D.I. 377 at a hearing scheduled for January 17, 2025 at 10:00 a.m.

4. Motion of the Debtors for Entry of an Order (I) Approving Stipulation Between Debtors, Bayonne Medical Center OPCO, LLC, Hudson Regional Hospital, LLC and the Official Committee of Unsecured Creditors Regarding Interim Management of Debtors' Hospitals and (II) Granting Related Relief [Filed: 12/30/2024; D.I. [377](#)].

Related Documents: None

Objection Deadline: January 6, 2025 at 4:00 p.m. (ET).

Objections Received:

A. Limited Objection of BMC Hospital, LLC to Motion of the Debtors for Order (I) Approving Stipulation Between Debtors, Bayonne Medical Center OPCO, LLC, Hudson Regional Hospital, LLC and the Official Committee of Unsecured Creditors Regarding Interim Management of Debtors' Hospitals and (II) Granting Related Relief [Filed: 01/06/2025; D.I. [398](#)].

B. Limited Objection and Reservation of Rights of J2 Funding, LLC, Signature RX Investments, LLC, and Bills Right LLC to Debtors' Motion for Entry

of Order (I) Approving Stipulation Between Debtors, Bayonne Medical Center OPCO, LLC, Hudson Regional Hospital, LLC and the Official Committee of Unsecured Creditors Regarding Interim Management of Debtors' Hospitals and (II) Granting Related Relief [Filed: 01/06/2025; D.I. [404](#)].

C. Limited Objection and Reservation of Rights to Motion of the Debtors for Order (I) Approving Stipulation Between Debtors, Bayonne Medical Center OPCO, LLC, Hudson Regional Hospital, LLC and the Official Committee of Unsecured Creditors Regarding Interim Management of Debtors' Hospitals and (II) Granting Related Relief [Filed: 01/06/2025; D.I. [406](#)].

Status: This matter has been continued to January 17, 2025 at 10:00 a.m.

Dated: January 9, 2025

DILWORTH PAXSON LLP

/s/ Peter C. Hughes

Peter C. Hughes (DE 4180)
800 N. King Street, Suite 202
Wilmington, DE 19801
Telephone: 302-571-9800
Facsimile: 302-571-8875
Email: phughes@dilworthlaw.com

and

Lawrence G. McMichael (admitted *pro hac vice*)
Peter C. Hughes (DE 4180)
Anne M. Aaronson (admitted *pro hac vice*)
Jack Small (admitted *pro hac vice*)
1650 Market St., Suite 1200
Philadelphia, PA 19103
Telephone: (215) 575-7000
Facsimile: (215) 754-4603
Email: lmcmichael@dilworthlaw.com
Email: phughes@dilworthlaw.com
Email: aaaronson@dilworthlaw.com
Email: jsmall@dilworthlaw.com

Counsel for the Debtors